

Federal Defenders
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Appeals Bureau
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392
www.federaldefendersny.org

David E. Patton
Executive Director
and Attorney-in-Chief

Appeals Bureau
Barry D. Leiwant
Attorney-in-Charge

March 23, 2016

By ECF

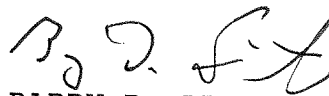
Honorable Lewis A. Kaplan
Judge, United States District Court
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Patrick Jackson v. United States,
16-cv-0432 (LAK)
(00-cr-0285 (LAK))

Your Honor:

We are in receipt of the Government's seven-page surreply, dated March 21, 2016. The surreply contains substantial new matter and citations to ten additional cases. In light of the importance of this case as one of the early Johnson 2255's in this district, movant is respectfully requesting permission to file a response by Monday, March 28. Assistant United States Attorney Lara Pomerantz has informed me that she consents to this request.

Respectfully,



BARRY D. LEIWANT
Assistant Federal Defender
Tel: (212) 417-8763

cc: Lara Pomerantz, Esq.
Assistant United States Attorney
Southern District of New York
(by ECF)